

**FEDERAL DEFENDER SERVICES  
OF WISCONSIN, INC.**

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November 23, 2020

Honorable William M. Conley  
United States District Court Judge  
120 North Henry Street  
Madison, Wisconsin 53703

Re: *United States v. Matthew Howard*  
Case No. 17-cr-81-wmc

Dear Judge Conley:

This case has been remanded for resentencing. I have spoken with Mr. Howard and he would like to appear in person for the sentencing hearing. For the reasons listed below, the defense would request that no hearing be scheduled until after the COVID outbreak subsides. I have spoken with AUSA Julie Pfluger, and she has no objection to this request.

As the Court may recall, Mr. Howard was previously diagnosed with Classical Hodgkin Lymphoma (subtype Nodular Sclerosis). He was diagnosed with stage IIA at that time. He underwent ABVD therapy, completing the final cycle months before his arrest. He's been in remission since then, but he has not seen an oncologist since May 2019. His yearly visit was suspended due to COVID-19 and he does not know when he'll be able to see an oncologist again. For safety reasons, he is not told when his next appointment will be.

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Mr. Howard and his mother have written letters to the Court about the concerns associated with COVID-19 and the effects of Howard's Hodgkin's Lymphoma (and the treatment he underwent). *See* R.117, 120. There is a heightened risk to Mr. Howard's health if he contracts COVID-19. I do not pretend to understand it all, but it revolves around the fragile state of his lungs and contracting COVID-19 could prove deadly. In other words, Mr. Howard has serious concerns for his safety and he would prefer to stay where he is until the outbreak is under control and the risk of COVID-19 is diminished.

Thus, I respectfully request the Court to allow the defense to file a status letter on March 31, 2021 about the ability of Mr. Howard to be safely transported to Dane County. I have spoken to AUSA Julie Pfluger and she has no objection to this request.

Thank you for your attention to this matter.

Sincerely,

*/s/ Joseph A. Bugni*

Joseph A. Bugni  
Associate Federal Defender

Cc: AUSA Julie Pfluger